

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

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DC PLASTIC PRODUCTS CORPORATION,

Plaintiff,

v.

Civil Action No.:  
2:17-cv-13092

WESTCHESTER SURPLUS LINES INSURANCE COMPANY,

Defendant.

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**NOTICE OF DEFENDANT'S MOTION**  
**FOR SUMMARY JUDGMENT**

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law dated October 28, 2022, Defendant's Local Civil Rule 56.1 Statement dated October 28, 2022, and all prior proceedings and pleadings herein, Defendant Westchester Surplus Lines Insurance Company will move this Court before the Honorable Stanley R. Chesler of the United States District Court of New Jersey, at the United States Courthouse, at 50 Walnut Street, Newark New Jersey 07101, on November 21, 2022, for an Order granting summary judgment, and dismissing the Complaint in its entirety with prejudice, and for such further relief as the Court may deem just and proper.

Dated: October 28, 2022  
New York, NY

Respectfully submitted,

**FORAN GLENNON PALANDECH  
PONZI & RUDLOFF PC**

By:

A handwritten signature in black ink, appearing to read "CJ Rocco", written over a horizontal line.

Charles J. Rocco, Esq.  
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